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July 24, 2007

DOCKET FILE COPY ORIGINAL

Marlene H. Dortch
Office of Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: VoIP E911 Compliance Letter of Baldwin Broadband, LLC
WC Docket Nos. 05-196, 04-36

Dear Ms. Dortch:

Baldwin Broadband, LLC d/b/a BTI ("Baldwin") hereby submits this letter in compliance with the Commission's First Report and Order in the above referenced dockets (the "VoIP 911 Order").

Baldwin plans to begin offering fixed, non-nomadic telephone service utilizing internet protocol technology ("VoIP") service in Hudson, Wisconsin and outlying rural areas beginning approximately August 16, 2007. Baldwin currently has no telephone customers. Baldwin will provide 911/E911 service to 100% of its customers in compliance with the Federal Communications Commission's ("Commission") rules. Further, Baldwin will not market to or accept new customers located in areas where it does not have 911 capabilities either directly or through its affiliate Baldwin Telecom, Inc. Baldwin does not plan to market, offer or provide VoIP service on a nationwide basis and does not plan on offering nomadic VoIP service.

As a CLEC, Baldwin is authorized by the Public Service Commission of Wisconsin to provide local exchange service in Wisconsin. Baldwin is currently interconnected with the public switched telephone network ("PSTN") and the Wireline E911 Network.

I. Scope of Coverage of 911 Solution.

100% of Baldwin's customers will have access to 911 service in compliance with the rules established by the Commission in its VoIP 911 Order.

A. 911 Routing Information/Connectivity to Wireline E911 Network.

Baldwin routes all 911 calls through Baldwin Telecom, Inc.'s local switch and over-separate dedicated 911 interconnection trunks to the appropriate selective router for delivery to the appropriate PSAP. As such, 100% of Baldwin's transmission of 911 calls is delivered through the use of ANI via the dedicated wireline E911 network.

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B. Transmission of ANI and Registered Location Information.

Baldwin sends all 911 calls to the appropriate selective router where a database "dip" occurs, in turn causing appropriate name, address, and number information to be routed to the appropriate PSAP along with the 911 call. Baldwin utilizes this process on 100% of its 911 calls. Accordingly, 100% of the 911 calls as well as ANI and the 911 caller's registered location will be transmitted to the PSAP. 100% of the answering points to which Baldwin transmits 911 information are capable of receiving name, address and phone number relating to 911 calls (i.e., are E911 capable).

C. The 911 Caller's Registered Location Will be Available to the PSAP From or Through the Appropriate ALI Database.

Baldwin will submit each customer's service address (registered location) information to the appropriate ALI database prior to initiating service. With respect to any and all changes in the customer's registered location, Baldwin will update the ALI database in a timely manner.

II. 100% of Baldwin's Customers will be Advised and Must Acknowledge That They have Been Informed of and Understand the Limitations of Baldwin's E911 Service Before VoIP Service Will be Provided.

Baldwin requires all customers to sign an agreement for services ("Service Agreement"). The Service Agreement prohibits customers from moving or relocating Baldwin provided customer premises equipment. The Service Agreement also informs customers that Baldwin's telephone service, including E911 service, will not operate if the Baldwin provided customer premises equipment is moved to another location. The Service Agreement further informs customers that in the event of a power outage Baldwin's telephone service including E911 service may not be operable.

Baldwin also requires its customers to sign an E911 Disclosure Notice before VoIP service will be provided. The E911 Disclosure Notice explains in plain language the circumstances under which Baldwin's E911 service is or may not be available. Such circumstances included, the moving or relocation of Baldwin provided customer premises equipment, the suspension of Baldwin VoIP service, a disruption of the broadband connection and a power outage. By signing the E911 Disclosure Notice Baldwin's customers acknowledge and agree that they have been advised and understand Baldwin's E911 service limitations. Baldwin will keep a record of the affirmative acknowledgements by every customer.

In addition, prior to initiation of service Baldwin will provide its customers with stickers to be placed on and/or near each telephone and the Baldwin provided customer premises equipment reminding customers of the Baldwin E911 service limitations.

Baldwin VoIP customers will be informed by Baldwin that the VoIP Service provided by Baldwin is a fixed, non-nomadic service that may be used only at the customer's service address (i.e., registered location). Baldwin will inform its VoIP customers: (1) at the time of the initial service request, (2) at the time of installation, (3) in the Service Agreement, and (4) in the E911 Disclosure Notice.

III. Obtaining Initial Registered Location Information.

Baldwin obtains registered location information for 100% of its customers at the time of the customer service request. A customer cannot obtain service from Baldwin without first providing a service address, which also serves as the registered location. When new subscribers order VoIP service, they will be required to provide and confirm the physical location of their service address during the order process. This will be required whether service is requested over the telephone, via the internet or in person at a Baldwin customer service location. In all cases an installation date for each customer will be arranged. As part of the installation service call, Baldwin technicians will verify that the address information that the customer provided Baldwin during the initial service

request, is correct. In sum, Baldwin will collect service location (registered location) information from 100% of its customers prior to the initiation of service.

IV. Obtaining Updated Registered Location Information.

Baldwin does not offer nomadic service to its customers. If a customer desires to move to a new location the customer must notify Baldwin and disclose the new service location. At the time of service installation, Baldwin provides to its customers an E911 Disclosure Notice (i.e., an acknowledgement form) and stickers detailing the requirement that a customer notify Baldwin in the event the customer desires to relocate service to a new address (registered location).

Customers can provide notice of their relocation to Baldwin by calling a Baldwin customer service representative or visiting a local Baldwin retail office. When the customer notifies Baldwin of the customer's intent to relocate, Baldwin will schedule a new installation appointment and dispatch a technician to provision VoIP service at the new location. As with an initial installation, the technician will install, if necessary, a terminal adapter and perform any necessary inside wiring work to ensure that the VoIP service operates throughout the customer premise. Apart from service activation, this service call also allows Baldwin to verify the customer's new service address (registered location).

V. Technical Solutions for Nomadic Subscribers.

Baldwin's VoIP service is a fixed, non-nomadic service. Baldwin has no plans to offer nomadic service in the future. Baldwin's VoIP service is designed to operate only when provided over Baldwin's facility based broadband access and the switching and routing facilities provided by Baldwin Telecom, Inc. Accordingly, devices used in connection with Baldwin's VoIP service are not designed to be moved or relocated. Thus, the technical solutions that have been designed "to ensure that subscribers have access to 911 service whenever they use their service nomadically" are not applicable to the fixed, facilities-based VoIP service provided by Baldwin.

VI. Baldwin Employee Responsible for E911 Compliance.

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Please contact the undersigned at the telephone number listed above if you have any questions about this filing.

Respectfully submitted,


Larry Knegendorf
General Manager

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